

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 24-cv-60984-Augustin-Birch

[Consent Case]

MELINDA MICHAELS,

Plaintiff,

v.

SEAWATER PRO LLC, and
MICHAEL SPANOS A/K/A MIKE SPANOS,

Defendants.

/

**JOINT MOTION TO RESET PRE-TRIAL DEADLINES
PENDING SUMMARY JUDGMENT OUTCOME**

Plaintiff MELINDA MICHAELS, and Defendants SEAWATER PRO LLC and MICHAEL SPANOS, by and through their undersigned counsel, respectfully submit this Joint Motion to Reset Pre-Trial Deadlines Pending Summary Judgment Outcome, and in support state the following:

1. On June 27, 2025, Plaintiff Melinda Michaels filed her Motion for Summary Judgment (ECF No. 56), and Defendant's SeaWater Pro LLC, and Michael Spanos filed their Motion for Summary Judgment (ECF No. 57).
2. On July 25, 2025, the Parties each filed their Responses to Summary Judgment (ECF No. 63 and ECF No. 64).
3. On August 1, 2025, the Parties each filed their Replies in Support of their Motions for Summary Judgment (ECF No. 66 and ECF No. 70).
4. On August 6, 2025, the Parties each filed their Motions in Limine (ECF No. 72 and ECF No. 73).

5. On August 15, 2025, Plaintiff filed her Response in Opposition to Defendants' Motion in Limine (ECF No. 74).
6. On August 16, 2025, Defendants filed their Response in Opposition to Plaintiff's Motion in Limine (ECF No. 75).
7. On August 21, 2025, Plaintiff filed her Reply in Support of her Motion in Limine (ECF No. 76).
8. On August 26, 2025, Defendants filed their Reply in Support of their Motion in Limine (ECF No. 77).
9. The Court's Order Amending Trial and Pretrial Schedule (ECF No. 47), directs the Parties to file their Joint Pretrial Stipulation, and Deposition Designations by September 23, 2025.
10. The Parties have conferred in good faith and jointly request the Court reset the deadlines for filing the Pretrial Stipulation and Deposition Designations after the entry of the Court's Opinion as to each parties Motion for Summary Judgment.
11. Federal Rule of Civil Procedure 6(b)(1) states that when a deadline exists for a party to act, the court "for cause shown may at any time in its discretion with or without motion or notice order the period enlarged if request thereof is made before the expiration of the period originally prescribed or as extended by previous order." The requested reset of deadlines are being sought in order to streamline the content of the Pretrial Stipulations and Deposition Designations in order to be succinct for trial, pending any decision from the Court on Summary Judgment. Moreover, as indicated by the joint nature of this motion, the Parties have conferred and are in agreement regarding the requested extensions.
12. For these reasons, the Parties respectfully request that the Court enter the attached proposed order granting the Parties' Joint Motion to reset the pretrial deadlines after opinion issues

on Summary Judgment, let all other deadlines remain, and grant such other further relief as the Court deems necessary.

WHEREFORE, the parties respectfully request the Court grant a reset of the pretrial deadlines.

Respectfully Submitted,

Dated: September 23, 2025.

/s/Dillon S. Cuthbertson

Dillon S. Cuthbertson, Esq.
Florida Bar No. 1056382
Elliot A. Kozolchyk, Esq.
Florida Bar No. 74791
Koz Law, P.A.
800 East Cypress Creek Road, Suite 421
Fort Lauderdale, FL 33334
Tel: (786) 924-9929
Email: dc@kozlawfirm.com
Email: ekoz@kozlawfirm.com
Attorneys for Plaintiff

/s/ Brian H. Pollock

Brian H. Pollock, Esq
Florida Bar No. 174742
Gaelle W. Colas, Esq.
Florida Bar No. 1006811
FAIRLAW FIRM
135 San Lorenzo Avenue, Suite 770
Coral Gables, FL 33146
Tel: (305) 230-4884
Email: brian@fairlawattorney.com
Email: gaelle@fairlawattorney.com
Attorneys for Defendants